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MICHAEL S. ACKERMAN
MA 2134

XCA L 46293-1/jo
ZUCKER, GOLDBERG & ACKERMAN
Attorneys for Secured Creditor
WELLS FARGO HOME MORTGAGE, INC.
1139 Spruce Drive
P.O. Box 1024
Mountainside, New Jersey 07092-0024
1-908-233-8500

UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF NEW JERSEY

IN THE MATTER OF:

CHAPTER 13

:

CASE NO. 02-52305 (RTL)

:

VICTOR RAIMO SR.

AMENDED NOTICE OF

: OBJECTION TO PLAN

DEBTOR.

: CONFIRMATION HEARING:

: 7/16/02 @ 9:00 AM

[Handwritten signature]
443 111-2113
11/16/02

The undersigned, ZUCKER, GOLDBERG & ACKERMAN, attorneys for Secured Creditor WELLS FARGO HOME MORTGAGE, INC., hereby amends its objection to the Debtor's Chapter 13 Plan on the following grounds:

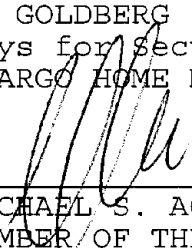
1. The Secured Creditor has filed a claim for arrearages in the amount of \$40,903.35.

2. The Debtor's plan provides for monthly Trustee distributions of \$417.

3. The Debtor's proposed plan will satisfy the Secured Creditor's claim within 104 months.

4. The Secured Creditor objects as the plan's duration is in excess of 60 months, in violation of 11 U.S.C. 1322(d) and the Debtor's plan is not feasible in violation of 11 U.S.C. 1325(a)(6).

ZUCKER, GOLDBERG & ACKERMAN
Attorneys for Secured Creditor
WELLS FARGO HOME MORTGAGE, INC.



MICHAEL S. ACKERMAN
MEMBER OF THE FIRM

DATED: March 28, 2002

<p>THIS IS AN ATTEMPT TO COLLECT A DEBT. ANY INFORMATION OBTAINED WILL BE USED FOR THAT PURPOSE.</p>

Document Page 3 of 3
ZUCKER, GOLDBERG & ACKERMAN

LEONARD B. ZUCKER
MICHAEL S. ACKERMAN
JOEL ACKERMAN*
THOMAS A. SZYMANSKI

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FOUNDED IN 1923
AS ZUCKER & GOLDBERG

MARCO M. BENUCCI
JANINE A. GETLER**
RICHARD P. HABER

MAURICE J. ZUCKER (1918-1979)
LOUIS D. GOLDBERG (1923-1967)
LEONARD H. GOLDBERG (1929-1979)
BENJAMIN WEISS (1949-1981)

*ALSO MEMBER OF NY AND CA BAR
**ALSO MEMBER OF NY AND PA BAR

E-MAIL: office@zuckergoldberg.com

- Of Counsel -
ROSALIND M. KENDELLEN
HOWARD R. BERMAN

XCA L 46293-1

March 28, 2002

Clerk, U.S. Bankruptcy Court
402 E State St, Room 3 4th Floor
Trenton, NJ 08608

Re: Victor Raimo Sr.
Loan No.: 8401921
Case No.: 02-52305 (RTL)
Premises: 469 Route 72
Barnegat, NJ 08005
Secured Creditor: WELLS FARGO HOME MORTGAGE, INC.

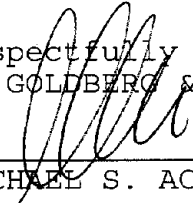
Dear Sir:

Relative to the above noted bankruptcy filed in your office, this office represents WELLS FARGO HOME MORTGAGE, INC., the secured creditor in the above matter.

At the request of our client, we enclose herewith an original and two (2) copies of an Amended Notice of Objection.

Please file the original in your office, note date of filing on the copies and return said extra copy to this office in the envelope enclosed.

Respectfully yours,
ZUCKER, GOLDBERG & ACKERMAN

By: 
MICHAEL S. ACKERMAN

MSA/jo
Enclosures
cc: Victor Raimo, Esq.
Robert M. Wood, Chapter 13 Trustee
Victor Raimo Sr.

THIS IS AN ATTEMPT TO COLLECT A DEBT.
ANY INFORMATION OBTAINED
WILL BE USED FOR THAT PURPOSE.

RECEIVED
U.S. BANKRUPTCY COURT
TRENTON, NJ
APR -1 PM 3:45
JAMES J. GALLERON
BY: DEPUTY CLERK